

Chatter:

Am. Compl. ¶	Allegation	Plaintiff fails to identify with specificity:
17	"Friedman employees mail out the correspondence regarding the alleged foreclosure sale . . ."	Date, time, place
25	"Defendants send this document to various third-party entities purporting to be the "noteholders" or loan servicers . . ."	Date, time, place, specific Defendant, recipient
34	"Defendants then begin the process of mailing various letters and notices of foreclosures to consumers . . ."	Date, time, place, specific Defendant, recipient
35	"[T]hese letters were form letters that the Defendants sent to every consumer from whom they attempted to collect a debt . . ."	Date, time, place, specific Defendant
36	"These letters all contain similar misrepresentations, including but not limited to, an incorrectly identified Noteholder of the loan."	Date, time, place, specific Defendant, content
39	"These foreclosure sale notices are mailed to consumers throughout Virginia and Maryland using the United States post office."	Date, time, place, specific Defendant
41	"[D]ocuments created by Defendants, which are subsequently mailed to consumers or to the Commission[er] of Accounts . . ."	Date, time, place, specific Defendant
54	"In approximately 2010, the Defendants began sending various correspondences to the Plaintiff in an attempt to collect the alleged debt . . ."	Date, time, place, specific Defendant
55	"[T]hese correspondences were form correspondences that the Defendants sent to every consumer who they attempted to collect a debt and conduct a foreclosure sale. . ."	Date, time, place, specific Defendant
57	"For example, letters sent to Plaintiff were styled "Chase home Finance, LLC v. Allen Chatter."	Date, time, place, specific Defendant
58	"Additionally, at times, Defendant Friedman signed the letters to the Plaintiff and putative class as Substitute Trustee."	Date, time, place
59	"The various letters to the Plaintiff and putative class further included an alleged Substitution of Trustee document . . ."	Date, time, place, specific Defendant
83	"Defendants' correspondence to Plaintiff stated that Plaintiff's home would be foreclosed and sold . . ."	Date, time, place, specific Defendant
134	"Plaintiff's proposed class counsel have a substantial number of correspondences and Deed of Appointment of Substitute Trustee mailed to consumers . . ."	Date, time, place, specific Defendant, recipient
138	"The letters, deed of appointment of substitute trustee, and trustees deeds are standardized and used across all Virginia jurisdictions . . ."	Date, time, place, specific Defendant, recipient
147	"[E]mployees who continued to sign and transmit the affidavits through the mail . . ."	Date, time, place, specific Defendant, recipient

EXHIBIT

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148	“For example, the transmission of the fraudulent substitute trustee documents and lost note affidavits through the United States mail system and through the wires for ultimate transmission to consumers and various state courts affected interstate commerce. The transmission of the racketeering proceeds to the Defendants by use of the United States mail system or via electronic wires also affected interstate commerce.”	Date, time, place, specific Defendant, recipient
149	“[T]he Defendants mailed and transmitted by computers the fraudulent substitute trustee documents and lost note affidavits. It began sometime as early as 2009 and continues to date and will be repeated again and again in the future to the detriment of Virginia consumers.”	Date, time, place, specific Defendant, recipient There can be no continuity because Defendants are “defunct.” Am. Compl. ¶¶ 1, 4.
150	“They involved an ongoing scheme to defraud consumers and courts, and they used both the mails and the interstate wires to send these documents to the consumers, the courts, and the entities whose employees supposedly signed the documents.”	Date, time, place, specific Defendant, recipient